

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BRAD AMOS,	)	
	)	Case No. 3:21-cv-00923
Plaintiff,	)	
	)	District Judge Richardson
v.	)	
	)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC,	)	
	)	Jury Demand
Defendant.	)	

**DEFENDANT’S UNOPPOSED MOTION TO EXPAND PAGE LIMITS**

Defendant, The Lampo Group, LLC, by and through the undersigned counsel and pursuant to Rule 16 of the Federal Rules of Civil Procedure, moves the Court to expand the parties’ page limits for their forthcoming summary judgment briefing. In support of this motion, Defendant states the following:

1. Plaintiff’s First Amended Complaint (Doc. #21) asserts six claims against Defendant:
  - a. Retaliatory discharge in violation of the Tennessee Public Protection Act, T.C.A. §50-1-304, *et seq.*;
  - b. Religious discrimination in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e, *et seq.*;
  - c. Religious discrimination in violation of the Tennessee Human Rights Act, T.C.A. §4-21-101, *et seq.*;
  - d. Fraud;
  - e. Promissory estoppel; and
  - f. Deceptive representations and false pretenses in violation of T.C.A. §50-1-102.

2. On March 16, 2022, Defendant filed a Second Motion to Dismiss Plaintiff's First Amended Complaint, which remains pending. (Docs. #30-31). The memorandum that Defendant filed in support of its Second Motion to Dismiss (Doc. #31) was approximately 17 pages, despite Defendant's attempts to keep it short and direct.
3. The parties have engaged in a considerable amount of discovery in this case, including several rounds of written discovery, 11 total depositions, and the production of nearly 52,000 pages of documents.
4. The Initial Case Management Order currently provides each party with 25 pages for summary judgment briefs, 25 pages for responses in opposition, and five pages for replies. (Doc. #26).
5. Defendant is concerned that these page limits will be inadequate given the number and nature of claims asserted by Plaintiff (particularly fraud, promissory estoppel, and violation of T.C.A. §50-1-102), legal arguments that Defendant needs to assert or reassert at summary judgment, and the extent of discovery in this case.
6. Defendant believes that the following expanded page limits would give the parties adequate space to fully present the facts of this case and their legal arguments to the Court: 40 pages for summary judgment briefs, 40 pages for responses in opposition, and 10 pages for replies.
7. Defendant has conferred with Plaintiff, through counsel, and confirmed that he does not oppose this motion.

Respectfully submitted,

/s/Leslie Goff Sanders

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**CERTIFICATE OF SERVICE**

I certify that, on July 24, 2023, I filed the foregoing *Defendant's Unopposed Motion to Expand Page Limits* via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Jonathan A. Street

Lauren J. Irwin

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/s/Leslie Goff Sanders

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